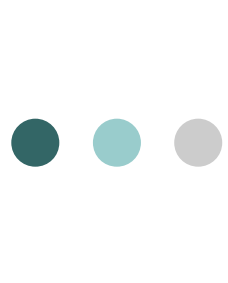




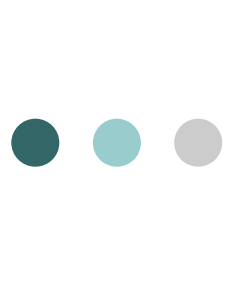
# NSP Monitoring Training

## June 11, 2009



# Agenda

- Welcome/Introductions
  - Community Development Staff
- Purpose of Monitoring
- Self Monitoring
- IHADA Monitoring
- Q & A



# IHCDA Community Development Staff

- Peter Hunt, NSP Manager
- Cecelia Johnson-Powell, Community Development Manager
- Brian Philps, Assistant Manager Community Development
- Dave Pugh, Community Development Inspector
- Shonda Banner, Community Development Coordinator
- Devyn Smith, Community Development Coordinator



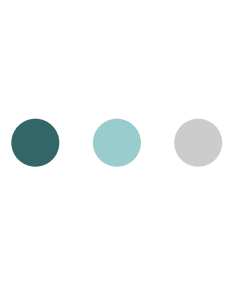
# Staff Continued

- North West
  - Megan Maxwell, Community Development Representative
  - Emily Duncan, Community Development Representative
- North East
  - Mike Recker, Community Development Representative
  - Lisa Weathers, Community Development Representative
- South West
  - Alan Rakowski, Community Development Representative
  - Jennifer Snider, Community Development Representative
- South East
  - Carmen Lethig, Community Development Representative
  - Talisha Bradley, Community Development Representative



# Program Monitoring

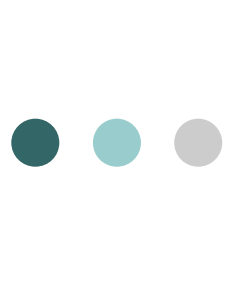
- Purpose
  - Progress
  - Record Maintenance
  - Program Requirements & Objectives



# Program Monitoring

- Self-Monitoring

- Should review periodically to ensure program compliance
- Should review prior to IHADA monitoring



# Program Monitoring

## ○ IHCDA Monitoring

### ● **Quarterly reporting**

- Due end of the month every three months
- First report due July 31, 2009
- Submit electronically to your regional rep

### ● **Semi-annual monitoring** (considered like a progress check)

- December 2009
- June 2010
- February 2013



# Program Monitoring

- **Annual monitoring** (more formal monitoring to check regulation compliance)
  - August 2011
  - August 2012
- **Final monitoring** (overall check of entire award)
  - August 2013





# Program Monitoring

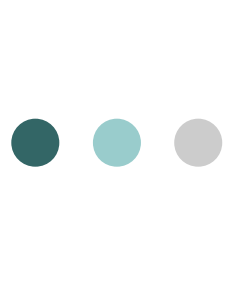
## ○ IHCDA Monitoring

### ● Results of Monitoring

- Satisfactory – no action is needed
- Concern – outstanding issue, unclear record, area needs improved for future awards – an action is required
- Finding – regulatory or statutory requirement was not met – an action is required

### ● Determination and Responses

- Written correspondence will follow the monitoring
- Recipient must respond to all concerns and/or findings within time frame specified by Rep.



# Program Monitoring

## ○ IHCDA Monitoring

- Clearing Issues/Findings
  - Once the response has been approved the concern/finding will be resolved.
- Sanctions
  - IHCDA may impose additional sanctions to
    - Prevent a recurrence of a deficiency
    - Mitigate the adverse effects or consequences of a deficiency



# Program Monitoring

## ○ IHCDA Monitoring

- Resolutions of Disagreements
  - Recipient may request a meeting with either the IHCDA NSP or Community Development Manager
  - Either Party may request a written determination from the U.S. Department of Housing and Urban Development (HUD) or State Attorney General
  - IHCDA will prepare a final determination signed by Executive Director
    - This determination will be based on the responses received from HUD or the State Attorney General as appropriate



# Program Monitoring

## ○ IHCDA Monitoring

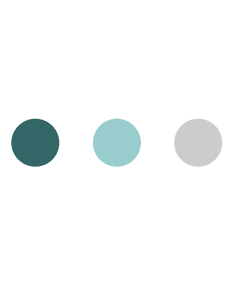
- OMB Circular A-133 Audit
  - Applies to Non-federal entities expending \$500,000 or more in federal funds during a fiscal year
- Audits must be submitted to IHCDA within 1 month of issuance of the auditor's report
- Cost of Audits
  - Due to the award being expended prior to audit, funds are not available from the award to pay this expense
  - Please keep this in mind that an A-133 audit will cost more than a typical audit



# Monitoring Tool

## Client Eligibility

- Accessible client files containing:
  - Signed receipt of lead & fair housing brochures
  - Proof that client receive lead assessment & notification of hazard reduction/clearance
  - Client Intake Applications including:
    - Name
    - Address
    - Household Size
    - Ethnicity
    - Number of Bedrooms
    - Signed & dated by Applicant
    - Client provided income information



# Monitoring Tool

## Client Eligibility

- Income Verification:
  - Annual Income Calculation spreadsheet  
(Found in the NSP Award Manual, Income Verification Chapter, Exhibit A)  
Income Verification must be signed and dated by client and third party verifier
- At time of monitoring, award recipient must have documentation of all income verification completed & present
- As well as other verification forms available such as child support, self-employment oral verification, employer verification, etc.



# Monitoring Tool

Unit Eligibility- Rental, Homebuyer

## ○ Documents:

- Rental- Leases
- Homebuyer- Purchase Agreements, Appraisals, HUD 1, other documentation showing property is abandoned (i.e. utility statements, property tax statements, etc.)

## ○ All Activities:

- All executed contracts,
- Inspection Certification form,
- Proof of home owners' receipt of Notification of Evaluation of Lead Assessment & Hazard Reduction & Clearance forms (signed receipt),
- Proof of home buyer completion of HUD-certified home ownership counseling (min. of 8 hours)



# Monitoring Tool

## Financial

- Documents needed:
  - Environmental Review
  - Federal Cash Control Register (FCCR)
    - (NSP Award Manual, Funds Management Chapter, Exhibit P)
    - 3 days to achieve balance less than \$5,000
  - Ledger of Expenditure by Site Address
    - (Found in the NSP Award Manual, Funds Management Chapter, Exhibit Q)
    - Site Address Ledger should correspond to the FCCR





# Monitoring Tool

Financial, cont.

- Source Documentation

(for all Administrative & Program Delivery)

- Maintain copies of signed timesheets of employees who worked on an IHCDCA funded program.
- Provide a copy of supporting documentation sent in to IHCDCA for admin. and program delivery draws. indicating employee, rate of pay, dates and # of hours billed to IHCDCA.



# Monitoring Tool

Financial- cont.

- Allowable Costs- Random review of checks to ensure all IHODA checks were distributed and received by contractors and vendors involved in development.
  - Copies of all cancelled checks/bank statements
- Documentation for Supportive Services (if applicable)



# Monitoring Tool

## Procurement

- Subrecipient Agreement (if applicable)
- Procurement Standards (for Not-for-Profits)-written, approved by IHCD & followed, OMB Circular A-110
- Procurement types:
  1. Competitive Sealed Bids- bid documents, advertisements, minutes of public meeting, bid comparison sheet
  2. Competitive Negotiation-(professional services) documentation of RFP process
  3. Small Purchase- (under \$25,000) documentation of at least two price quotes
  4. Noncompetitive Sole Source Provider-IHCD approval



# Monitoring Tool

## Procurement -cont.

- Construction Contracts must contain:
  - All construction contracts must be signed and dated by both parties
  - Section 3 language
    - NSP awards over \$200,000
    - All sub-contracts over \$100,000
  - Federal Contract Provisions must be stapled to or included within contract (Do not just reference the provisions)
  - Fixed amount of payment (NO: cost + % of cost)
  - Executed after Release of Funds date & receiving Section 106 concurrence



# Monitoring Tool

## Procurement- cont.

- Contractors-
  - Documentation of contractor checked against HUD Debarred List
  - Signed receipt of Lead-based paint Brochures
- Bonds- applicable if contracts > \$100,000
- MBE/WBE- proof of soliciting at least 2 MBE/WBE firms (certified mail, certificate of mailing, hand delivery & signed receipt)



# Monitoring Tool

Davis Bacon

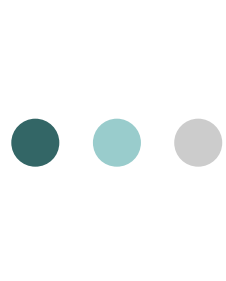
- HUD 4010 Wage Decisions
- Notice of Contract Execution
- Certified payrolls
- Copy of minutes from bid opening
- Verification of wages
- Notification of Completion/Final Inspection
- Final Wage Compliance Report
- Employee Interviews
- Proof of displaying required posters at job site  
(Equal Housing Opportunity, IOSHA, Federal Polygraph, Secretary of Labor's Wage, and wage decision)

# Monitoring Tool

## Fair Housing



- All client correspondence must contain Fair Housing & Accessibility logos
- Posters: Posted in client intake area
  1. Equal Housing Opportunity
  2. Fair Housing
  3. Lead Based Paint
- TDD devices/Relay Indiana, able to furnish auxiliary aids, handicap accessible



# Monitoring Tool

## Fair Housing

- Affirmative Marketing Procedures-
  - Local Units of Government only
    - Documentation showing action to affirmatively further fair housing
  - LUGs and NFPs
    - Documentation showing each beneficiary received fair housing brochure
    - Proof of posting the fair housing poster in recipient's and subrecipient's office





# Monitoring Tool

## Relocation (URA)

- Notices
  - Notice of Non-Displacement
  - Notice to Tenants Moving in After Application
  - General Information Notice
  - Temporary Relocation Notice
  - Notice of Eligibility for Relocation Assistance
  - 90-Day and 30-Day Notices
- Documentation showing proof of payment for moving expenses and assistance in finding comparable housing.



# Monitoring Tool

## Award Conditions

- Minimum of 8 hours of Homeownership Pre-Purchase counseling (before closing)
- Public hearing- at least 1 before closing award
- Accept and act on any technical assistance given by IHCD during award



# Q &A

## Contact Info.

### **Indiana Housing and Community Development Authority**

30 S. Meridian St., Ste. 1000

Indianapolis, IN 46204

Ph: 317-232-7777, 800-872-0371

Fax: 317-232-7778

Web site: <http://ihcda.in.gov>